

Before The
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of: :
Pimmit Branch :
Falls Church, Virginia 22043 : Docket No. A2011-90
(Elaine J. Mittleman, Petitioner):
:

**MOTION OF PETITIONER TO
REQUEST THE UNITED STATES POSTAL SERVICE TO
SUPPLEMENT THE RECORD CONCERNING THE
RELOCATION OF THE MAIN POST OFFICE IN
FALLS CHURCH, VIRGINIA 22046
(October 18, 2011)**

Petitioner Elaine Mittleman hereby respectfully submits this motion to request that the United States Postal Service (õPostal Serviceö) supplement record concerning the relocation of the Main Post Office in Falls Church, Virginia 22046.

Petitioner also requests that the Postal Service post a notice in the Pimmit Branch that this appeal is pending and further requests that the Postal Service make available the appeal documents at the Pimmit Branch. The customers of the Pimmit Branch do not know about the appeal from the closure sign presently posted at the Pimmit Branch.

ARGUMENT

Petitioner was advised on October 17, 2011, by a postal service employee that the Falls Church Main Office, located at 301 W. Broad Street, Falls Church, VA 22046, will be relocated in the near future. The site of the relocation is apparently in Merrifield, Virginia. The present Merrifield facility is at 8409 Lee Highway, Merrifield, Virginia 22081.

This planned relocation presents many questions which affect the Pimmit Branch and its customers. These include: 1) will the carrier service be changed; 2) will there be increased costs for the carrier service to be relocated miles away from the present facility; 3) when will the relocation occur; 4) will there be a change in notices about certified mail and package pickup; and 5) will the delivery schedules and routes remain the same.

There are also other concerns about the relocation. The present lease at 301 W. Broad Street expires on February 28, 2013. *See* attached lease information. Will the Postal Service incur costs to break that lease and what are those costs? Will the Postal Service sign a new lease for the relocation? What is the cost of that lease? Would it be more cost efficient to stay at 301 W. Broad Street?

Also, the Merrifield location is presumably either in Merrifield, Virginia or Fairfax, Virginia, rather than Falls Church. Even if the site chosen

for the new facility has a Falls Church mailing address, it will not be located in the city of Falls Church, but in Fairfax County. Is it possible for the Falls Church Post Office to be located in a place other than the city of Falls Church? Will the relocated post office be given a name other than Falls Church if it is not located in Falls Church? Also, how will the Postal Service choose the location for the new facility? Is it based on cost savings or some other factors? It is important to understand the financial implications of the relocation of the Falls Church Post Office.

Petitioner requests that this information be provided and the record in this appeal be supplemented. The relocation of the Falls Church Post Office will affect the Pimmit Branch and its customers. It is necessary to evaluate the information about the relocation of the Falls Church Post Office before the appeal about the closing the Pimmit Branch is decided.

Petitioner submits that this information is needed to prepare the brief in support of the petition. Petitioner also requests an extension of time to file the brief, which is due on November 1, 2011, until she has had time to review the additional information about the relocation of the Falls Church Post Office.

CONCLUSION

For the foregoing reasons, the Postal Service should provide

information and supplement the record in this appeal about the planned relocation of the Falls Church Post Office, which is presently located at 301 W. Broad Street, Falls Church, VA 22046. Petitioner requests an extension of time to file the initial brief until after the record has been supplemented. In addition, the Postal Service should post a notice of this appeal at the Pimmit Branch.

Respectfully submitted,

Elaine Mittleman
2040 Arch Drive
Falls Church, VA 22043
(703) 734-0482
Petitioner